

## **FREQUENTLY ASKED QUESTIONS ON THE COMBINED SEWER OVERFLOW (CSO) DISCHARGE MONITORING REPORT (DMR)**

### **QUESTION:**

On page one you talk about a "measurable precipitation" event as one of 0.10-inches or greater. There may be some people that would argue that you are trying to define a wet weather event and that this letter is an inappropriate way to do it. In some cities, if 0.10-inches fall on the corporate limits, it could amount to twice our dry weather flow. I would argue that this is significant rather than measurable.

### **ANSWER:**

The intent is not to define a wet weather event, but rather to define the minimum amount of specificity utilized in the measurement of a precipitation event. The majority of rain gauges can at least measure precipitation to the nearest 0.1-inch. If a community has rain gauges, which can measure increments smaller than 0.1-inch, the events can be reported to their capabilities. If less than 0.1-inch of precipitation is measured, it is not necessarily considered a dry weather overflow, but the community may be a candidate for a early warning sewer ban because the collection system does not have any reserve capacity to handle wet weather flows. IDEM understands there may be circumstances such as large rainfalls on days preceding an overflow with less than 0.1-inch rainfall, which would also be indicated on the CSO DMR, which may be the cause of such an overflow.

### **QUESTION:**

With your definition of "Day" on page two, if a city has a 0.5-inch rain event that begins at 9:00 p.m. and ends at 11:30 p.m., are the overflows which will still be occurring after midnight considered DWOs?

### **ANSWER:**

No, the overflows in your example would not be considered DWOs. "Day" in this context is defined only to ensure the amount of rainfall is differentiated so that the amount of rainfall is entered on the correct lines, and are consistent from community to community. The definition of "Day" is not limiting the end of an overflow to 12 PM regardless of the time the overflow began. An overflow, which runs through more than one "Day," does not automatically become a DWO on the second "Day". The total duration of the overflow after the rainfall has ceased would be a factor that would cause the overflow to be considered a DWO.

### **QUESTION:**

In your definition of "precipitation," how does one measure snow melt? Additionally, why must we report overflows in the winter since recreational standards do not apply then?

### **ANSWER:**

The actual measured amount of snowfall, when it occurs, will be entered on the CSO DMR on the day it occurs. If and when the CSOs begin to overflow due to snow melt, as

a temperature greater than 32 degrees is reached (IDEM realizes it may be days later), SM will be entered in the precipitation column to indicate the overflow occurred as a result of snow melt. We realize snowmelt would be very difficult for most communities to quantify, and that snowmelt may last for several days as temperatures fluctuate. Also, even though recreational standards do not apply during the winter, the NPDES permit still requires the reporting of CSO overflows throughout the year.

**QUESTION:**

With "time discharge begins," how will Cities that do not have monitors at each CSO or a model complete this section? Will we continue a "If I don't observe it, I don't have to report it"?

**ANSWER:**

No, the "If I don't observe it, I don't have to report it," response will not be accepted by IDEM regarding CSO DMR reporting. The Attachment A for every CSO community requires them to report the duration and frequency of a CSO event. The information does not have to be metered, and can be either metered/measured or estimated, but not reporting an overflow due to it occurring outside of their working hours or observation time, would be a lack of compliance with permit conditions. There must be some mechanism the community will utilize to either estimate or meter the overflows, which could be as simple as chalking the CSOs and making visual inspections.

**QUESTION:**

If a community has multiple rain gauges, do they have to utilize just one gauge? If we only have one rain gauge do we have to utilize others for different CSO points?

**ANSWER:**

No, the rain gauge located in the closest proximity to each CSO outfall should be utilized. If multiple rain gauges are utilized, the CSOs closest to each rain gauge should be listed on the same page as the precipitation results from the rain gauge. Another option is to add an asterisk next to the Outfall number on the CSO DMR, and attach an additional page(s) with the data from the rain gauge in the closest proximity to each CSO outfall, if it differs from the rainfall data entered on that page. If there is only one rain gauge located in the closest proximity to all of the CSOs, the community will only need to utilize the information obtained from the single rain gauge.

**QUESTION:**

What is the peak influent flow rate?

**ANSWER:**

The peak influent flow rate is the highest sustained influent flow the WWTP reached for each single "Day." It is recorded in Million Gallons, instead of Million Gallons per day, since it is a rate, and not an average calculated over a period of time.

**QUESTION:**

When will this form be utilized, when is it due, and is it submitted differently than the WWTP MROs?

**ANSWER:**

The CSO DMR form will be utilized by CSO communities on October 1, 2001, and it will be due by the 28<sup>th</sup> of the following month. Therefore the first new CSO DMR form must be submitted by November 28, 2001. The form is submitted to IDEM, Office of Water Quality, Compliance Branch, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015.

**QUESTION:**

Can we send our WWTP MROs and the new CSO DMR together in one envelope?

**ANSWER:**

The WWTP MROs are compiled and tracked by the Financial and Administrative Services Branch, Data Management Section, and the CSO DMRs will be compiled and tracked by the Compliance Branch, Wet Weather Section. In order to avoid any future confusion and to ensure the DMRs reach the correct location, the CSO DMRs should be sent to the Compliance Branch. However, if you wish to try and save a stamp, the CSO DMR can be placed in a separate envelope inside the envelope which contains the MRO, and marked "Attention – Compliance Branch -CSO DMR."

**QUESTION:**

We want to create our own form so that we can enter the information on the computer, is this accepted?

**ANSWER:**

No, the CSO DMR forms can be sent to the communities in either Microsoft Excel or Quatro Pro, upon request, for their convenience. The forms may not be submitted electronically, but this will enable the community to easily access and use the standard state approved form. The standard form can not be altered other than utilizing the form for data entry. If the community feels this form is not useable, they must submit a written request to use an alternative form with an example, and may not use a different or altered form until written approval has been received from IDEM, Office of Water Quality, Compliance Branch.